

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY MUTUAL FIRE INSURANCE
COMPANY AND LIBERTY INSURANCE
CORPORATION,

Plaintiffs,

v.

SPRING CITY ELECTRICAL
MANUFACTURING COMPANY AND SCF
INVESTMENTS, INC. AND MILLER AND
BRINK OF CALIFORNIA, INC. AND
WESTERN LIGHTING CO.,

Defendants.

Civil Action No. 02-2785

**MOTION TO COMPEL DISCOVERY
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 37(2)(B) AND
LOCAL RULE OF CIVIL PROCEDURE
26.1(g)**

PLEASE TAKE NOTICE that the undersigned hereby applies to the United States District Court for the Eastern District of Pennsylvania, the Honorable Marvin Katz, Senior Judge, for an order compelling defendants to answer plaintiffs' interrogatories and to compel compliance with plaintiffs' request for production of documents.

Reliance is placed upon the accompanying affidavit of Jonathan M. Kuller, Esq., which sets forth counsel's efforts to secure the discovery without Court action.

A proposed form of Order is submitted herewith.

Plaintiff does not know whether or not this motion will be contested.

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Dated: September 20, 2002
Document # 129979